

1 Edward Manibusan (F0131)
2 Attorney General
3 Alison Nelson (T0160)
4 Assistant Attorney General
5 Office of the Attorney General
Hon. Juan A. Sablan Mem. Bldg., 2nd Floor
Saipan, MP 96950-8907
Tel: (670) 237-7500
Fax: (670) 664-2349
Email: alison_nelson@cnmioag.org

*Attorney for Defendant Andrew Yeom
in his official and personal capacities*

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN MARIANA ISLANDS**

**11 IMPERIAL PACIFIC INTERNATIONAL
12 (CNMI), LLC**

12 Plaintiff,

V.

15 COMMONWEALTH OF THE NORTHERN
16 MARIANA ISLANDS;
17 COMMONWEALTH CASINO
18 COMMISSION; ARNOLD PALACIOS,
19 Governor of CNMI, in his official capacity;
20 EDWARD C. DELEON GUERRERO,
21 Chairman of CCC, in his official and
22 personal capacities; RAFAEL S.
23 DEMAPAN, Vice Chairman of CCC, in his
official and personal capacities; MARIANO
TAITANO, Commissioner of CCC, in his
official and personal capacities; MARTIN
MENDIOLA, Commissioner of CCC, in his
official and personal capacities; RAMON M.
DELA CRUZ, Commissioner of CCC, in his
official and personal capacities; and
ANDREW YEOM, Executive Director of
CCC, in his official and personal capacities.

Defendants.

CIVIL CASE NO. 1:24-cv-00001

**DEFENDANT ANDREW YEOM'S
MOTION TO DISMISS FIRST
AMENDED COMPLAINT PURSUANT
TO FEDERAL RULES OF CIVIL
PROCEDURE 12(b)(1) AND 12(b)(6)**

Hearing Date:

Hearing Time:

Judge: Hon. David O. Carter

26 COMES NOW, Defendant Andrew Yeom, Executive Director of the Commonwealth
27 Casino Commission, in his official and personal capacities, by and through undersigned

1 counsel, and hereby moves this Court to dismiss Plaintiff's First Amended Complaint as to
2 Defendant Yeom pursuant to Federal Rules of Civil Procedure 12(b)(1) and 12(b)(6). This
3 Motion is accompanied by a legal memorandum of points and authorities. *See LR 7.1(b).*

4

5 Dated: April 25, 2024

OFFICE OF THE ATTORNEY GENERAL

6

7

/s/

Alison M. Nelson (T0160)
Assistant Attorney General

8

9

*Attorney for Defendant Andrew Yeom
in his official and personal capacities*

10

11

12

13

CERTIFICATE OF SERVICE

14

15

I hereby certify that the above and foregoing Motion was electronically filed on April
25, 2024, with service requested to all parties of record.

16

17

/s/

Alison M. Nelson (T0160)
Assistant Attorney General

18

19

20

*Attorney for Defendant Andrew Yeom
in his official and personal capacities*

21

22

23

24

25

26

27

28